

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA**

HOLLEY PERFORMANCE
PRODUCTS INC.,

Plaintiff and Counter-Defendant,

v.

ACES FUEL INJECTION, INC.,

Defendant and Counter-Plaintiff.

Case No. 1:26-cv-59-CEA-CHS

ACES FUEL INJECTION, INC.'S RULE 26(a)(1)(A) INITIAL DISCLOSURES

Pursuant to Rule 26(a)(1) of the *Federal Rules of Civil Procedure*, Defendant/Counter-Plaintiff Aces Fuel Injection, Inc. (“Aces”) submits these initial disclosures to Plaintiff/Counter-Defendant Holley Performance Products, Inc. (“Holley”) as follows:

RULE 26(a)(1)(A)(i)

Provide the name and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims and defenses, unless the use would be solely for impeachment.

RESPONSE: Based on information reasonably available to Aces at present, Aces believes such individuals include the following:

Employees of Aces Fuel Injection, Inc.
To be contacted only through counsel for Aces
Include without limitation:

1. **Hongjun Ma**
2. **Li Pei**
3. **Josh Goodpaster; and**

4. Andrea Wiren

Subject: The foregoing employees of Aces may have information regarding the design, development, manufacture and sale of Aces products that are accused of infringement; non-infringement by Aces; relevant prior art; the IPR Petitions filed by Aces; the acquisition of the '475 Patent; infringement by Holley of the '475 Patent; the market for and industry and technical knowledge of the products accused of infringement in this case; and/or Aces sales and commercial success of products that practice the claims of the '475 Patent.

5. Grant Heiser

To be contacted through counsel for Aces

Subject: Mr. Heiser is an employee of Aces and has knowledge of Aces's early operations, product rollout, product configurations, inventory, fulfillment, shipping, and knowledge of related company records.

6. Daniel Odear

To be contacted through counsel for Aces

Subject: Mr. Odear is an employee of Aces and has knowledge of customer support, reported product and technical issues, RMA records, customer feedback, product manuals, and information provided to customers.

7. Kenneth W. Farrell

To be contacted through his counsel

Subject: Upon information and belief Mr. Farrell will have information regarding the conception and reduction to practice of the alleged inventions claimed in the asserted Holley patents.

8. Warren Lamont Duff

To be contacted through Holley's litigation counsel

Subject: Upon information and belief Mr. Duff has knowledge concerning the conception, development, reduction to practice, and prosecution in the USPTO of patent protection for the inventions disclosed and claimed in the '475 Patent and products that practice the claims of that patent; EFI products developed and sold by Holley that are or may be at issue in this matter.

9. Named inventors of the Holley patents asserted against Aces in this case

Contact information unknown at this time

Subject: Upon information and belief, the named inventors will have information regarding at least the conception and reduction to practice of the alleged inventions claimed in the asserted Holley patents.

10. Aces Damages Expert

To be identified in accordance with the Scheduling Order and Rules 26(a)(2) and 26(a)(2)(B) of the Federal Rules of Civil Procedure

Subject: Information related to Holley's damages claim and Aces's damages claim.

12. Aces Technical Expert(s)

To be identified in accordance with the Scheduling Order and Rules 26(a)(2) and 26(a)(2)(B) of the Federal Rules of Civil Procedure

Subject: Design, development and operation of relevant EFI products; the current and historical state of the art of technology related to relevant EFI products; the meaning of terms used by persons of ordinary skill in the art as applied to the patents-in-suit; the skill and knowledge of one of ordinary skill in the art; infringement, non-infringement, validity, invalidity of patents asserted in case.

13. Representatives of Holley Performance Products, Inc.

To be contacted through counsel for Plaintiff

Subject: Upon information and belief, representatives of Holley will have information regarding the conception and reduction to practice of the alleged inventions claimed in the asserted Holley patents, and products that purport to practice the claims of one or more of such patents; knowledge of the manufacture, importation, use, offers to sell and sale of EFI products that are accused of infringing the '475 Patent; proof of Holley's failure to mark its patented products; Holley's knowledge of the '475 Patent; knowledge of prior art relevant to patents-in-suit.

This designation is without prejudice to Aces's right to supplement. In addition, Aces reserves its right to identify expert witnesses at a later date and reserves its right not to call as witnesses one or more of the individuals referenced above.

RULE 26(a)(1)(A)(ii)

Provide a copy of – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control of the party and may use to support its claims and defenses, unless the use would be solely for impeachment.

RESPONSE: Based on information reasonably available to Aces at present, Aces believes such documents, data compilations, and tangible things are grouped in the following categories and are currently in the possession of Aces:

1. Patents asserted in the case and their prosecution histories.
2. Images of accused Holley products from inspection

3. Screen shots of accused Holley products as shown on internet
4. Screen shots of Holley website showing no information relative to patents asserted by Holley
5. Assignment and related chain-of-title documents re '475 Patent
6. Holley advertising documents
7. Aces's IPR Petitions and related exhibits
8. Engineering drawings, CAD files, technical specifications of Aces accused products and of Aces products that practice the inventions claimed in the '475 Patent
9. Documents relating to development, commercialization and sales of Aces products practicing '475 Patent
10. Prior art patents and other documents relevant to invalidity and Aces IPR Petitions
11. Product manuals, installation instructions, technical specifications, and marketing materials for the accused Holley products
12. Reverse-engineering, inspection, testing, and comparative analyses of Aces accused products
13. Evidence supporting secondary considerations of non-obviousness, including without limitation commercial success and copying
14. Communications between the parties concerning the patents-in-suit, accused products, licensing, infringement allegations, or business dealings
15. PTAB filings and other materials generated during the Aces IPR process
16. Although not currently in its possession, custody or control, Aces reserves the right to use any documents identified through discovery, reviewed by experts in this suit, identified by Holley in its Initial Disclosures, and/or disclosed through third-party subpoenas

RULE 26(a)(1)(A)(iii)

Provide a computation of each category of damages claimed by the disclosing party – who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

RESPONSE: Not presently known, as Aces's damages claim will depend, in large part, on evidence of Holley's sales and/or licensing of infringing products including without limitation the Holley Sniper 2 EFI, the Holley EFI Terminator X Stealth and the Holley Atomic EF which information is not currently in Aces's possession, custody or control. At minimum, Aces expects to produce evidence supporting its entitlement to a reasonable royalty under the '475 Patent and an award up to treble damages arising from Holley's willful infringement. Additionally, if the Court determines that this case is exceptional under the provisions of 35 U.S.C. § 285, Aces should be awarded its costs, attorneys fees and expenses incurred.

RULE 26(a)(1)(A)(iv)

Provide for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

RESPONSE: Aces is not aware of any insurance agreement for which an insurance business may be liable to satisfy all or part of a possible judgment.

DATED this 6th day of August, 2026.

Respectfully submitted,

CHAMBLISS, BAHNER & STOPHEL, P.C.

By: /s/ John G. Jackson

John G. Jackson (Bar No. 013840)

Susie Lodico (Bar No. 023754)

Peter Newman (Bar No. 040524)

Liberty Tower

605 Chestnut Street, Suite 1700

Chattanooga, TN 37450

Telephone: (423) 757-0246

Facsimile: (423) 508-1246

Email: jjackson@chamblisslaw.com

slodico@chamblisslaw.com

pnewman@chamblisslaw.com

*Attorneys for Defendant/Counter-Plaintiff Aces
Fuel Injection, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on August 6, 2026, a true and correct copy of Aces Fuel Injection, Inc.'s Rule 26 Initial Disclosures was served via E-Mail upon the following:

Jessica Malloy-Thorpe
MILLER & MARTIN PLLC
Suite 1200, Volunteer Building
832 Georgia Avenue
Chattanooga, TN 37402
Telephone: (423) 756-6600
Facsimile: (423) 785-8480
jessica.malloy-thorpe@millermartin.com

Marc Lorelli*
John P. Rondini*
Yasmeen Moradshahi*
BROOKS KUSHMAN P.C.
150 W. Second St., Suite 400N
Royal Oak, Michigan 48067-3846
Tel (248) 358-4400 | Fax (248) 358-3351
mlorelli@brookskushman.com
jrondini@brookskushman.com
ymoradshahi@brookskushman.com

*admitted *pro hac vice*

*Attorneys for Plaintiff and Counter-
Defendant*

/s/ John G. Jackson
John G. Jackson